

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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: 08 Civ. 10934 (KBF)

In re 650 Fifth Avenue and Related Properties

: ECF Case

:

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STATE OF NEW YORK)
COUNTY OF NEW YORK : ss.:
SOUTHERN DISTRICT OF NEW YORK)

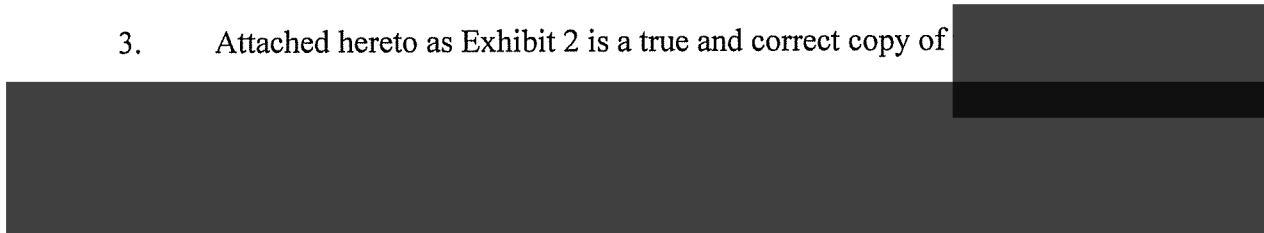
**DECLARATION OF JENNIFER A. MCREYNOLDS
IN SUPPORT OF THE GOVERNMENT'S MOTION
FOR SUMMARY JUDGMENT**

Jennifer A. McReynolds deposes and says:

1. I am a Special Agent with the Federal Bureau of Investigation ("FBI") assigned to the New York Joint Terrorism Task Force ("JTTF"). The facts contained within this Declaration are based upon my own personal knowledge, my participation in the investigation of this matter, my conversations with other law enforcement officers, my review of the records and reports maintained by the Federal Bureau of Investigation ("FBI"), my review of the files of the United States Attorney's Office, and filings in this matter.

2. Attached hereto as Exhibit 1 is a true and correct copy of the Certificate of Incorporation of the Pahlavi Foundation that was filed on or about December 5, 1973, bates number ALV_00036109 to ALV_00036120.

3. Attached hereto as Exhibit 2 is a true and correct copy of



4. Attached hereto as Exhibit 3 is a true and correct copy of [REDACTED]

5. Attached hereto as Exhibit 4 is a true and correct copy of [REDACTED]

6. Attached hereto as Exhibit 5 is a true and correct copy of [REDACTED]

7. Attached hereto as Exhibit 6 is a true and correct copy of [REDACTED]

8. Attached hereto as Exhibit 7 is a true and correct copy of [REDACTED]

9. Attached hereto as Exhibit 8 is a true and correct copy [REDACTED]

10. Attached hereto as Exhibit 9 is a true and correct copy of the [REDACTED]

11. Attached hereto as Exhibit 10 is a true and correct copy of a [REDACTED]

12. Attached hereto as Exhibit 11 is a true and correct copy of [REDACTED]

13. Attached hereto as Exhibit 12 is a true and correct copy of [REDACTED]

14. Attached hereto as Exhibit 13 is a true and correct copy the Restated Certificate of Incorporation of the Pahlavi Foundation dated on or about July 2, 1980, bates numbers SDNY-0003525 to SDNY.

15. Attached hereto as Exhibit 14 is a true and correct copy of [REDACTED]

16. Attached hereto as Exhibit 15 is a true and correct copy of [REDACTED]

17. Attached hereto as Exhibit 16 is a true and correct copy of [REDACTED]

18. Attached hereto as Exhibit 17 is a true and correct copy of [REDACTED]

19. Attached hereto as Exhibit 18 is a true and correct copy the Verified Petition to authorize the transfer property dated on or about October 11, 1989 signed by then President of the Mostazafan Foundation, Mohammad Badr-Taleh, bates number SDNY-0023054 to SDNY-0023062.

¹ English-language translations of Persian documents attached to this affidavit are not necessarily final drafts, and are subject to review and revision.

20. Attached hereto as Exhibit 19 is a true and correct copy of [REDACTED]

21. Attached hereto as Exhibit 20 is a true and correct copy of [REDACTED]

22. Attached hereto as Exhibit 21 is a true and correct copy [REDACTED]

23. Attached hereto as Exhibit 22 is a true and correct copy of [REDACTED]

24. Attached hereto as Exhibit 23 is a true and correct copy of [REDACTED]

25. Attached hereto as Exhibit 24 is a true and correct copy of [REDACTED]

26. Attached hereto as Exhibit 25 is a true and correct copy of [REDACTED]

[REDACTED]

27. Attached hereto as Exhibit 26 is a true and correct copy of un

[REDACTED]

28. Attached hereto as Exhibit 27 is a true and correct copy of

[REDACTED]


29. Attached hereto as Exhibit 28 is a true and correct copy

[REDACTED]


30. Attached hereto as Exhibit 29 is a true and correct copy of

[REDACTED]


31. Attached hereto as Exhibit 30 is a true and correct copy of



32. Attached hereto as Exhibit 31 is a true and correct copy of



33. Attached hereto as Exhibit 32 is a true and correct copy of



34. Attached hereto as Exhibit 33 is a true and correct copy of the Certificate of Incorporation of Assa Corp. dated on or about July 13, 1989.

35. Attached hereto as Exhibit 34 is a true and correct copy of the Statement by Incorporator of Action Taken in Lieu of Organization Meeting of Assa Corp., a New York Corporation dated on or about July 17, 1989, and attached By-Laws of Assa Corp., bates numbers SDN- 0002670 to SDNY 0002681.

36. Attached hereto as Exhibit 35 is a true and correct copy of [REDACTED]

37. Attached hereto as Exhibit 36 is a true and correct copy of [REDACTED]

38. Attached hereto as Exhibit 37 is a true and correct copy of [REDACTED]

39. Attached hereto as Exhibit 38 is a true and correct copy of [REDACTED]

40. Attached hereto as Exhibit 39 is a true and correct copy of [REDACTED]

41. Attached hereto as Exhibit 40 is a true and correct copy of [REDACTED]

[REDACTED]

42. Attached hereto as Exhibit 41 is a true and correct copy of [REDACTED]

[REDACTED]

43. Attached hereto as Exhibit 42 is a true and correct copy of a [REDACTED]

[REDACTED]

44. Attached hereto as Exhibit 43 is a true and correct copy of [REDACTED]

[REDACTED]

45. Attached hereto as Exhibit 44 are true and correct copies of [REDACTED]

[REDACTED]

46. Attached hereto as Exhibit 45 are true and correct copies of [REDACTED]

[REDACTED]

47. Attached hereto as Exhibit 46 are true and correct copies of [REDACTED]

[REDACTED]

[REDACTED]

48. Attached hereto as Exhibit 47 are true and correct copies of [REDACTED]

[REDACTED]

49. Attached hereto as Exhibit 48 are true and correct copies of [REDACTED]

[REDACTED]

50. Attached hereto as Exhibit 49 is a true and correct copy of [REDACTED]

[REDACTED]

51. Attached hereto as Exhibit 50 is a true and correct copy of [REDACTED]

[REDACTED]

52. Attached hereto as Exhibit 51 are true and correct copies of relevant Alavi Foundation Tax Returns between 1999 to 2007.

53. Attached hereto as Exhibit 52 is a true and correct copy of [REDACTED]

[REDACTED]

54. Attached hereto as Exhibit 53 is a true and correct copy of [REDACTED]

[REDACTED]

55. Attached hereto as Exhibit 54 are true and correct copies of [REDACTED]

[REDACTED]

56. Attached hereto as Exhibit 55 is a true and correct copy of [REDACTED]

[REDACTED]

57. Attached hereto as Exhibit 56 is a true and correct copy of [REDACTED]

[REDACTED]

58. Attached hereto as Exhibit 57 are true and correct copies of [REDACTED]

[REDACTED]

59. Attached hereto as Exhibit 58 are true and correct copies of [REDACTED]

60. Attached hereto as Exhibit 59 are true and correct copies of C [REDACTED]

61. Attached hereto as Exhibit 60 is a true and correct copy of a Certificate of Amendment of the Certificate of Incorporation of the Mostazafan Foundation of New York dated on or about June 10, 1992, bates numbers SDNY-0003501 to SDNY-0003506.

62. Attached hereto as Exhibit 61 is a true and correct copy of [REDACTED]

63. Attached hereto as Exhibit 62 is a true and correct copy of the Summons and Complaint filed in the United States District Court, Southern District of New York under *Gabay v. Mostazafan Foundation of Iran, et al.*, (the “Gabay Action”) on or about September 22, 1992, bates numbers SDNY-0027648 to SDNY-0027667.

64. Attached hereto as Exhibit 63 is a true and correct copy of [REDACTED]

65. Attached hereto as Exhibit 64 is a true and correct copy of t [REDACTED]

66. Attached hereto as Exhibit 65 is a true and correct copy of [REDACTED]

67. Attached hereto as Exhibit 66 is a true and correct copy of [REDACTED]

68. Attached hereto as Exhibit 67 is a true and correct copy of [REDACTED]

69. Attached hereto as Exhibit 68 is a true and correct copy of the [REDACTED]

70. Attached hereto as Exhibit 69 are true and correct copies of [REDACTED]

71. Attached hereto as Exhibit 70 is a true and correct copy of an Indictment charging Farshid Jahedi in two counts, 09 Cr. 460 (SAS) (S.D.N.Y.).

72. Attached hereto as Exhibit 71 is a true and correct copy of the court transcript of Farshid Jahedi plea hearing taken on December 30, 2009 before the Honorable Shira A. Scheindlin, bates numbers SDNY-0758410 to SDNY-0758437.

73. Attached hereto as Exhibit 72 is a true and correct copy of [REDACTED]

74. Attached hereto as Exhibit 73 is a true and correct copy of

75. Attached hereto as Exhibit 74 is a true and correct copy of

76. Attached hereto as Exhibit 75 is a true and correct copy of

77. Attached hereto as Exhibit 76 is a true and correct copy of

78. Attached hereto as Exhibit 77 is a true and correct copy of

79. Attached hereto as Exhibit 78 is a true and correct copy of [REDACTED]

[REDACTED]

80. Attached hereto as Exhibit 79 is a true and correct copy of [REDACTED]

[REDACTED]

81. Attached hereto as Exhibit 80 is a true and correct copy of [REDACTED]

[REDACTED]

82. Attached hereto as Exhibit 81 is a true and correct copy of [REDACTED]

[REDACTED]

83. Attached hereto as Exhibit 82 is a true and correct copy of the minutes of [REDACTED]

[REDACTED]

84. Attached hereto as Exhibit 83 is a true and correct copy of [REDACTED]

[REDACTED]

[REDACTED]

85. Attached hereto as Exhibit 84 is a true and correct copy of a [REDACTED]

[REDACTED]

86. Attached hereto as Exhibit 85 is a true and correct copy of [REDACTED]

[REDACTED]

87. Attached hereto as Exhibit 86 is a true and correct copy of [REDACTED]

[REDACTED]

88. Attached hereto as Exhibit 87 is a true and correct copy of the Summons and Complaint filed in the Supreme Court, State of New York under *Hanif Partnership v. Assa Corp., et al.*, on or about February 18, 2004, bates numbers SDNY-0016388 to SDNY-0016442.

89. Attached hereto as Exhibit 88 is a true and correct copy of the [REDACTED]

[REDACTED]

90. Attached hereto as Exhibit 89 is a true and correct copy of [REDACTED]

[REDACTED]

91. Attached hereto as Exhibit 90 is a true and correct copy and specifically incorporate herein the relevant statutory authority pages, identified in pages 6 through 16 of the Verified Amended Complaint filed in this matter on November 12, 2009.

92. Attached hereto as Exhibit 91 is a true and correct copy of [REDACTED]
[REDACTED]

93. Attached hereto as Exhibit 92 is a true and correct copy of a fax from [REDACTED]
[REDACTED]

94. Attached hereto as Exhibit 93 is a true and correct copy of a [REDACTED]
[REDACTED]

95. Attached hereto as Exhibit 94 is a true and correct copy of [REDACTED]
[REDACTED]

96. Attached hereto as Exhibit 95 is a true and correct copy of [REDACTED]
[REDACTED]

97. Attached hereto as Exhibit 96 is a true and correct copy of [REDACTED]
[REDACTED]

98. Attached hereto as Exhibit 97 are true and correct copies of [REDACTED]
[REDACTED]

99. Attached hereto as Exhibit 98 are true and correct copies of [REDACTED]

100. Attached hereto as Exhibit 99 are true and correct copies of [REDACTED]

101. Attached hereto as Exhibit 100 are true and correct copies of [REDACTED]

102. Attached hereto as Exhibit 101 is a true and correct copy of [REDACTED]

103. Attached hereto as Exhibit 102 is a true and correct copy of [REDACTED]

104. Attached hereto as Exhibit 103 is a true and correct copy of [REDACTED]


105. Attached hereto as Exhibit 104 is a true and correct copy of [REDACTED]

106. Attached hereto as Exhibit 105 is a true and correct copy of [REDACTED]


107. Attached hereto as Exhibit 106 is a true and correct copy of [REDACTED]

108. Attached hereto as Exhibit 107 is a true and correct copy of [REDACTED]


109. Attached hereto as Exhibit 108 is a true and correct copy of




110. Attached hereto as Exhibit 109 is a true and correct copy of



111. Attached hereto as Exhibit 110 is a true and correct copy of the




112. Attached hereto as Exhibit 111 is a true and correct copy of




113. Attached hereto as Exhibit 112 is a true and correct copy of a Deed made on April 8, 1974 between the Pahlavi Foundation Endowment and the Pahlavi Foundation.

114. Attached hereto as Exhibit 113 is a true and correct copy of

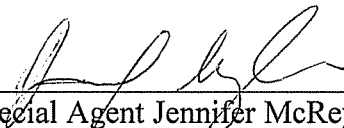


115. Attached hereto as Exhibit 114 is a true and correct copy of

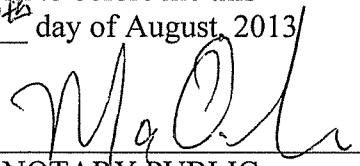


I declare under penalty of perjury that the foregoing is true and correct pursuant to Title 28,
United States Code, Section 1746.

Dated: New York, New York
August 17, 2013


Special Agent Jennifer McReynolds
Federal Bureau of Investigation

Sworn to before me this
17th day of August, 2013


NOTARY PUBLIC

MARCO DASILVA
Notary Public, State of New York
No. 01DA6145603
Qualified in Nassau County
My Commission Expires May 8, 2014